

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>K.W. <i>ex rel</i> KANISA DAVIS, et al.</b>	)	
	)	
<b>Plaintiffs</b>	)	<b>NO. 3:16-cv-1975</b>
	)	
<b>v.</b>	)	<b>Judge Crenshaw</b>
	)	
<b>RUTHERFORD COUNTY, TENNESSEE.</b>	)	<b>Magistrate Judge Holmes</b>
	)	
<b>Defendant.</b>	)	<b>JURY DEMAND</b>

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**PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT AS TO LIABILITY**

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Come now Plaintiffs, by and through counsel, and move this Honorable Court pursuant to FRCP 56 to grant summary judgment as to liability to Plaintiffs for all counts. In support of this motion, Plaintiffs submit the attached memorandum of law and supporting exhibits.

Respectfully submitted,

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### **CERTIFICATE OF SERVICE**

I hereby certify that on **December 6, 2018** a copy of the foregoing **Plaintiff's Motion for Summary Judgment** was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to each of the parties on the electronic filing receipt, including **Randall Mantooth and Michael Holder**, Counsels for **Defendant Rutherford County**, at [randy.mantooth@leitnerfirm.com](mailto:randy.mantooth@leitnerfirm.com) and [michael.holder@leitnerfirm.com](mailto:michael.holder@leitnerfirm.com). Parties may access this filing through the Court's electronic filing system.

*s/ Kyle Mothershead*

Kyle Mothershead, BPR 22953